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April 13, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket No. 23-03-EL – 2023 Annual Retail Rate Filing
Responses to Record Requests**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), please find enclosed the Company’s response to Record Request No. 1 issued at the Commission’s evidentiary hearing on March 22, 2023 in the above referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosure

cc: Docket 23-03-EL Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Elaina M. Weir

April 13, 2023

Date

**Rhode Island Energy – 2023 Annual Retail Rate Filing - Docket No. 23-03-EL
Service List Updated 2/21/2023**

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Record Request No. 1

Request:

Please respond to PUC 4-9 through 4-14 in Docket No. 5234 (2022 Retail Rate filing) using dates and information applicable to the rates proposed in the 2023 Retail Rate filing.

Response:

In preparation for these responses, the Company consulted with National Grid, which provides services to the Company under a transition services agreement.

[Responses begin on next page]

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-03-EL
In Re: 2023 Annual Retail Rate Filing
Responses to Record Requests
Issued at the Commission's Evidentiary Hearing
On March 22, 2023

PUC 4-9
(Response for RR-1 in Docket No. 23-03-EL)

Request:

Update the Company's response to PUC 1-12 to reflect the correct reconstituted load impact for the period of April 2023 – March 2024. In your response, include a detailed explanation of how the Company calculated the reconstituted load impact.

Response:

Please see "Attachment RR-1" page 1 and page 2 for the reconstituted load impact related to Regional Network Load for The Narragansett Electric Company. The reconstituted load impact of \$2.9m is already included in the Regional Network Load total found on Schedule AS-2 page 1 of the 2023 Annual Retail Rate Filing.

The Narragansett Electric Company
d/b/a Rhode Island Energy
RIPUC Docket No. 23-03-EL
In Re: 2023 Annual Retail Rate Filing
Responses to Record Requests
Issued at the Commission's Evidentiary Hearing
On March 22, 2023

PUC 4-10
(Response for RR-1 in Docket No. 23-03-EL)

Request:

For the purposes of LNS cost allocation, confirm whether or not the Company will adjust its non-PTF demand for the period of April 2023 – March 2024 for the reconstituted load impact from 4-9.

Response:

The Company confirms that the Non-PTF demand charge, includes the impact related to reconstituted load.

PUC 4-11
(Response for RR-1 in Docket No. 23-03-EL)

Request:

Using the reconstituted load impact from 4-9, re-calculate the non-PTF demand charge for the period of April 2023 – March 2024.

Response:

Please see “Attachment RR-1” page 3 and page 4 for the reconstituted load impact related to Local Network Load for The Narragansett Electric Company. The reconstituted load impact of \$508k is already included in the Local Network Load total found on Schedule AS-5 page 1 of the 2023 Annual Retail Rate Filing.

Please note that during the data gathering for this request, the Company found that the forecasted LNS load used in Schedule AS-5 page 1 column (1) of the 2023 Annual Retail Rate Filing was overstated by 108,112 kW, due to the inclusion of Local Network Load from other Rhode Island customers (Pascoag, Deepwater Wind, and Block Island). The inclusion of this load slightly increased the Non-PTF Demand Charge in column (2), and the Scheduling & Dispatching column (3) of Schedule AS-5, because these calculations are based on load *multiplied* by the fixed FERC rate. Since historical load is used to forecast transmission expenses, and due to existing practices of reconciling these forecasted expenses against actuals expenses, the Company suggests letting this item be reconciled in next year's annual retail rate filing. This suggestion was informally communicated to the Division, which did not object to the Company's proposal of not changing the factor now and reflecting any actual discrepancies in the reconciliation next year.

PUC 4-12
(Response for RR-1 in Docket No. 23-03-EL)

Request:

Update Schedule NECO-11 using the revised forecasts of PTF and non-PTF demand charges from in the Company's responses to 4-9 and 4-11.

Response:

The Company confirms that reconstituted load was already part of the original calculations at the time of the 2023 Annual Retail Rate Filing, as reconstituted load is inherently included in the Narragansett Electric Company's Regional Network Load, and Local Network Load totals found in Schedule AS 2 page 1, and Schedule AS-5 page 1 of the 2023 Annual Retail Rate Filing. This means that any impact related to The Narragansett Electric Company's reconstituted load is already included in the 2023 Annual Retail Rate Filing.

PUC 4-13
(Response for RR-1 in Docket No. 23-03-EL)

Request:

How confident is the Company in its updated reconstituted load impact estimate from 4-9? As part of your response, describe the potential scenarios that could cause the actual reconstituted load impact to vary from the estimate.

Response:

In preparation for these responses, the Company consulted with National Grid, which provides services to the Company under a transition services agreement.

The Company believes that the reconstituted numbers provided for RR-1 reflect actual numbers and are reasonable.

PUC 4-14
(Response for RR-1 in Docket No. 23-03-EL)

Request:

If any new DG facilities greater than 25 kW interconnect to the Company's distribution system between April 2023 and March 2024, what impact might those facilities have on the reconstituted load impact estimate from 4-9?

Response

In preparation for this response, the Company consulted with National Grid.

Any DG facilities that are registered with ISO-NE will be reconstituted in the Regional Network Load, which would be reflected in Attachment RR-1 page 1 & 2.

The Narragansett Electric Company
Estimated Changes in PTF Demand Charges
Estimated for the Year 2023 Due to Reconstitution of Regional Network Load

Line #	Period	(1) Annual RNS Rate (\$/kW-Yr)	(2) Monthly Non- Reconstituted PTF kW Load	(3) PTF Demand Charge on Non- Reconstituted Load	(4) Reconstituted Load Included in RNL	(5) Monthly PTF kW Load as it appears in ISO-NE RNL Reports	(6) Actual PTF Demand Charge	(7) Variance PTF Demand Charge
1	April	\$ 141.64	638,659	7,538,571	334	638,993	7,542,513	3,942
2	May	\$ 141.64	1,374,423	16,223,345	20,844	1,395,267	16,469,382	246,037
3	June	\$ 141.64	1,047,948	12,369,716	73,234	1,121,182	13,234,152	864,436
4	July	\$ 141.64	1,494,992	17,646,511	83,164	1,578,156	18,628,158	981,647
5	August	\$ 141.64	1,539,234	18,168,733	54,918	1,594,152	18,816,971	648,238
6	September	\$ 141.64	1,050,824	12,403,663	15	1,050,839	12,403,840	177
7	October	\$ 141.64	923,759	10,903,820	11,045	934,804	11,034,192	130,372
8	November	\$ 141.64	1,176,971	13,892,671	688	1,177,659	13,900,792	8,121
9	December	\$ 141.64	1,139,587	13,451,400	705	1,140,292	13,459,721	8,322
10	January	\$ 144.72	1,185,497	14,297,094	22	1,185,519	14,297,359	265
11	February	\$ 144.72	982,616	11,850,349	513	983,129	11,856,536	6,187
12	March	\$ 144.72	902,360	10,882,462	749	903,109	10,891,495	9,033
13	Total		13,456,870	\$159,628,333	246,231	13,703,101	\$162,535,111	\$2,906,778

Notes

Line 1-9: Column (1) = Schedule AS-3 Line 1

Line 10-12: Column (1) = Schedule AS-3 Line 8

Line 1-12: Column (2) = Internal Monthly Non-Reconstituted Regional Network Load for January 2022 to December 2022

Line 1-12: Column (3) = Column (1) x Column (2) / 12

Line 1-12: Column (4) = Internal Records

Line 1-12: Column (5) = Column (2) + Column (4). ISO-NE Monthly Regional Network Load Reports January 2022 to December 2022 as per Schedule AS-2

Line 1-12: Column (6) = Column (1) x Column (5) / 12

Line 1-12: Column (7) = Column (6) - Column (3)

The Narragansett Electric Company
 Estimated Changes in PTF Demand Charges
 Estimated for the Year 2023 Due to Reconstitution of Regional Network Load

Line #	Period	(1) Annual RNS Rate (\$/kW-Yr)	(2) Peak Date	(3) Peak Hour	(4) Monthly Non- Reconstituted PTF kW Load	(5) PTF Demand Charge on Non- Reconstituted Load	(6) Reconstituted Load Included in RNL	(7) Reconstituted Peak Date	(8) Reconstituted Peak Hour	(9) Monthly PTF kW Load as it appears in ISO-NE RNL Reports	(10) Actual PTF Demand Charge	(11) Variance PTF Demand Charge
1	April	\$ 141.64	4/6/2022	20	638,659	7,538,571	334	4/6/2022	20	638,993	7,542,513	3,942
2	May	\$ 141.64	5/22/2022	19	1,374,423	16,223,345	20,844	5/22/2022	19	1,395,267	16,469,382	246,037
3	June	\$ 141.64	6/26/2022	18	1,047,948	12,369,716	73,234	6/26/2022	18	1,121,182	13,234,152	864,436
4	July	\$ 141.64	7/21/2022	16	1,494,992	17,646,511	83,164	7/21/2022	16	1,578,156	18,628,158	981,647
5	August	\$ 141.64	8/8/2022	17	1,539,234	18,168,733	54,918	8/8/2022	17	1,594,152	18,816,971	648,238
6	September	\$ 141.64	9/12/2022	20	1,050,824	12,403,663	15	9/12/2022	20	1,050,839	12,403,840	177
7	October	\$ 141.64	10/13/2022	19	923,759	10,903,820	11,045	10/13/2022	19	934,804	11,034,192	130,372
8	November	\$ 141.64	11/21/2022	18	1,176,971	13,892,671	688	11/21/2022	18	1,177,659	13,900,792	8,121
9	December	\$ 141.64	12/27/2022	18	1,139,587	13,451,400	705	12/27/2022	18	1,140,292	13,459,721	8,322
10	January	\$ 144.72	1/11/2022	18	1,185,497	14,297,094	22	1/11/2022	18	1,185,519	14,297,359	265
11	February	\$ 144.72	2/14/2022	19	982,616	11,850,349	513	2/14/2022	19	983,129	11,856,536	6,187
12	March	\$ 144.72	3/28/2022	20	902,360	10,882,462	749	3/28/2022	20	903,109	10,891,495	9,033
13	Total				13,456,870	\$159,628,333	246,231			13,703,101	\$162,535,111	\$2,906,778

Notes

- Line 1-9: Column (1) = Schedule AS-3 Line 1
- Line 10-12: Column (1) = Schedule AS-3 Line 8
- Line 1-12: Column (2) = RNS Original Monthly Peak Date
- Line 1-12: Column (3) = RNS Original Monthly Peak Hour
- Line 1-12: Column (4) = Internal Monthly Non-Reconstituted Regional Network Load for January 2022 to December 2022
- Line 1-12: Column (5) = Column (1) x Column (3) / 12
- Line 1-12: Column (6) = Internal Records
- Column (7) = RNS Reconstituted Monthly Peak Date
- Line 1-12: Column (8) = RNS Reconstituted Monthly Peak Hour
- Line 1-12: Column (9) = Column (4) + Column (6). ISO-NE Monthly Regional Network Load Reports January 2022 to December 2022 as per Schedule AS-2
- Line 1-12: Column (10) = Column (1) x Column (9) / 12
- Line 1-12: Column (11) = Column (10) - Column (5)

The Narragansett Electric Company
Estimated Changes in Non-PTF Demand Charges
Estimated for the Year 2023 Due to Reconstitution of Local Network Load

Line #	Period	(1) Annual LNS Rate (\$/kW-Yr)	(2) Monthly Non- Reconstituted Non-PTF kW Load	(3) Non-PTF Demand Charge on Non- Reconstituted Load	(4) Reconstituted Load Included in Local Network Load	(5) Monthly Non-PTF kW Load Actuals used for Non-PTF Demand Charge	(6) Actual Non-PTF Demand Charge	(7) Variance Non-PTF Demand Charge
1	April	\$ 2.06	626,564	1,291,545	334	626,898	1,292,234	688
2	May	\$ 2.06	1,358,142	2,799,556	20,844	1,378,986	2,842,522	42,966
3	June	\$ 2.06	1,038,017	2,139,678	73,234	1,111,251	2,290,636	150,958
4	July	\$ 2.06	1,474,730	3,039,880	83,164	1,557,894	3,211,307	171,427
5	August	\$ 2.06	1,522,738	3,138,839	54,918	1,577,656	3,252,042	113,203
6	September	\$ 2.06	1,035,868	2,135,248	15	1,035,883	2,135,279	31
7	October	\$ 2.06	909,812	1,875,407	11,045	920,857	1,898,174	22,767
8	November	\$ 2.06	1,160,610	2,392,380	688	1,161,298	2,393,798	1,418
9	December	\$ 2.06	1,132,838	2,335,134	705	1,133,543	2,336,587	1,453
10	January	\$ 2.12	1,171,091	2,483,864	22	1,171,113	2,483,911	47
11	February	\$ 2.12	967,985	2,053,080	513	968,498	2,054,168	1,088
12	March	\$ 2.12	889,003	1,885,560	749	889,752	1,887,149	1,589
13	Total		13,287,396	\$27,570,170	246,231	13,533,627	\$28,077,805	\$507,636

Notes

Line 1-9: Column (1) = Schedule AS-6 Page 1 Line 11

Line 10-12: Column (1) = Schedule AS-6 Page 2 Line 8

Line 1-12: Column (2) = Internal Non-Reconstituted Monthly Local Network Load for January 2022 - December 2022

Line 1-12: Column (3) = Column (1) x Column (2)

Line 1-12: Column (4) = Internal Records

Line 1-12: Column (5) = Column (2) + Column (4). Actual Monthly Local Network Load used in Non-PTF Demand Charge for January 2022 to December 2022

Line 1-12: Column (6) = Column (1) x Column (5)

Line 1-12: Column (7) = Column (6) - Column (3)

The Narragansett Electric Company
Estimated Changes in Non-PTF Demand Charges
Estimated for the Year 2023 Due to Reconstitution of Local Network Load

Line #	Period	(1) Annual LNS Rate (\$/kW-Yr)	(2) Peak Date	(3) Peak Hour	(4) Monthly Non- Reconstituted Non-PTF kW Load	(5) Non-PTF Demand Charge on Non- Reconstituted Load	(6) Reconstituted Load Included in Local Network Load	(7) Reconstituted Peak Date	(8) Reconstituted Peak Hour	(9) Monthly Non-PTF kW Load Actuals used for Non-PTF Demand Charge	(10) Actual Non-PTF Demand Charge	(11) Variance Non-PTF Demand Charge
1	April	\$ 2.06	4/6/2022	20	626,564	1,291,545	334	4/6/2022	20	626,898	1,292,234	688
2	May	\$ 2.06	5/22/2022	19	1,358,142	2,799,556	20,844	5/22/2022	19	1,378,986	2,842,522	42,966
3	June	\$ 2.06	6/26/2022	18	1,038,017	2,139,678	73,234	6/26/2022	18	1,111,251	2,290,636	150,958
4	July	\$ 2.06	7/21/2022	16	1,474,730	3,039,880	83,164	7/21/2022	16	1,557,894	3,211,307	171,427
5	August	\$ 2.06	8/8/2022	17	1,522,738	3,138,839	54,918	8/8/2022	17	1,577,656	3,252,042	113,203
6	September	\$ 2.06	9/12/2022	20	1,035,868	2,135,248	15	9/12/2022	20	1,035,883	2,135,279	31
7	October	\$ 2.06	10/13/2022	19	909,812	1,875,407	11,045	10/13/2022	19	920,857	1,898,174	22,767
8	November	\$ 2.06	11/21/2022	18	1,160,610	2,392,380	688	11/21/2022	18	1,161,298	2,393,798	1,418
9	December	\$ 2.06	12/27/2022	18	1,132,838	2,335,134	705	12/27/2022	18	1,133,543	2,336,587	1,453
10	January	\$ 2.12	1/11/2022	18	1,171,091	2,483,864	22	1/11/2022	18	1,171,113	2,483,911	47
11	February	\$ 2.12	2/14/2022	19	967,985	2,053,080	513	2/14/2022	19	968,498	2,054,168	1,088
12	March	\$ 2.12	3/28/2022	20	889,003	1,885,560	749	3/28/2022	20	889,752	1,887,149	1,589
13	Total				13,287,396	\$27,570,170	246,231			13,533,627	\$28,077,805	\$507,636

Notes

Line 1-9: Column (1) = Schedule AS-6 Page 1 Line 11

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Line 1-12: Column (2) = LNS Original Monthly Peak Date

Line 1-12: Column (3) = LNS Original Monthly Peak Hour

Line 1-12: Column (4) = Internal Non-Reconstituted Monthly Local Network Load for January 2022 - December 2022

Line 1-12: Column (5) = Column (1) x Column (4)

Line 1-12: Column (6) = Internal Records

Line 1-12: Column (7) = LNS Reconstituted Monthly Peak Date

Line 1-12: Column (8) = LNS Reconstituted Monthly Peak Hour

Line 1-12: Column (9) = Column (4) + Column (6). Actual Monthly Local Network Load used in Non-PTF Demand Charge for January 2022 to December 2022

Line 1-12: Column (10) = Column (1) x Column (9)

Line 1-12: Column (11) = Column (10) - Column (5)